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March 14, 1997

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BY HAND

Mr. William F. Caton EX PARTE OR LATE FILED  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Ex Parte Notice, IB Docket No. 96-220

Dear Mr. Caton:

On March 12, 1997, representatives of CTA Commercial Systems, Inc. ("CTA"), met with staff of the FCC's International Bureau, to discuss issues raised in the Commission's Notice of Proposed Rulemaking in the above-referenced proceeding. During that meeting, the CTA representatives indicated that CTA could share downlink spectrum, in either the 137.0-138.0 MHz band or the 400.15-401.00 MHz band, with another Little LEO system, with CTA scaling back its system requirements and accepting a smaller system than the one for which it currently has an application on file.

The FCC staff asked that CTA contact other applicants, and seek to obtain confirmation from one or more of these applicants that CTA's proposal for sharing downlink spectrum is indeed workable. In furtherance of this objective, CTA has met over the past two days with representatives of LEO One USA Corporation and Final Analysis Communication Services, Inc. ("Final Analysis").

CTA and Final Analysis have today reached consensus on a plan for sharing downlinks in the 400.15-401.00 MHz band. The sharing arrangement also

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\*\*ADMITTED IN FRANCE ONLY

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Mr. William F. Caton  
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contains a proposed division of uplink feeder link spectrum, which had been another source of contention among the parties; the proposed approach would involve both CTA and Final Analysis scaling back considerably from their originally requested 50 kHz of uplink feeder link spectrum, with a similar accommodation expected from the System B licensee.

A document embodying the proposed arrangement for sharing between CTA and Final Analysis is enclosed. The document is signed by the chief engineers of the two companies.

It should be emphasized that, in signing an arrangement regarding sharing, neither CTA nor Final Analysis intends to relinquish any rights that it might otherwise have, in the event that the Commission does not proceed with an approach that would allow sharing along the lines discussed in the enclosed document. The two companies are also willing to consider other sharing approaches. In addition, both CTA and Final Analysis view the proposed approach as solely an interim solution, to allow the FCC to proceed with Little LEO licensing in advance of the World Radio Conference later this year, after which it is hoped that additional spectrum will be made available to the FCC's Little LEO licensees.

Please direct any questions regarding the enclosed to the undersigned or to Final Analysis's counsel, Aileen Pisciotta.

Respectfully submitted,



Phillip L. Spector

Enclosure

cc (by hand, with enclosure):

Ms. Ruth Milkman  
Mr. Tom Tycz  
Ms. Cassandra Thomas  
Ms. Paula Ford  
Ms. Julie Garcia  
Mr. Harry Ng  
Aileen Pisciotta, Esq.

**SHARING OF SYSTEM A (AS PROPOSED BY LEO ONE)  
BETWEEN CTA COMMERCIAL SYSTEMS, INC.  
AND  
FINAL ANALYSIS COMMUNICATION SERVICES, INC.**

1. Downlinks -- CTA would use downlinks between 400.150 and 400.225 MHz, and between 400.925 and 401.000 MHz. The remainder of System A downlink spectrum would be used by Final Analysis.
  
2. Uplink Feeder Links -- CTA would use 149.950-149.975 MHz. Final Analysis would use 150.0125-150.0500 MHz. (This approach leaves 37.5 kHz, from 149.9750 to 150.0125 MHz, for System B's uplink feeder links; this represents a minor change from the original Leo One proposal, necessary to accommodate three systems (CTA and Final Analysis in System A, plus a System B licensee) within the original System A/B spectrum.)
  
3. Uplink Service Links -- CTA, Final Analysis and the System B licensee would share service links as proposed by Leo One.

**CTA Commercial Systems, Inc.**

By: Regan Howard  
Regan Howard  
Chief Engineer

**Final Analysis  
Communication Services, Inc.**

By: David Grimes  
David Grimes  
Chief Engineer